

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

CLINGMAN & HANGER	§	
MANAGEMENT ASSOCIATES, LLC,	§	
as Trustee of the Furie Litigation Trust,	§	
<i>Plaintiff,</i>	§	
	§	
v.	§	Civil Action No. 4:21-cv-02698
	§	
KAY RIECK; LARS DEGENHARDT;	§	
THEODOR VAN STEPHOUDT; DAVID	§	
HYCK, REED SMITH LLP; THOMAS	§	
E. HORD; MICHAEL ANTHONY	§	
NUNES; STONE PIGMAN WALTHER	§	
WITTMAN LLC, in its own capacity and	§	
as successor by merger to COGAN &	§	
PARTNERS LLP; DAVID ELDER;	§	
BRUCE GANER; SIERRA PINE	§	
RESOURCES INTERNATIONAL, INC.;	§	
and HELENA ENERGY, LLC,	§	
<i>Defendants.</i>	§	

**DEFENDANTS DAVID HYCK AND THEODOR VAN STEPHOUDT'S  
UNOPPOSED MOTION TO EXTEND TIME TO ANSWER**

TO THE HONORABLE CHARLES R. ESKRIDGE III:

Defendants David Hyck and Theodor Van Stephoudt ("Defendants"), respectfully request an extension of time to October 1, 2021 to answer, move, or otherwise respond to Plaintiff's state-court petition which was removed to this Court in the above-styled and numbered civil action.

Plaintiff filed Plaintiff's Original Petition ("Petition") on August 6, 2021, and it was assigned to the 334<sup>th</sup> District Court of Harris County, Texas. Defendants are residents of New York. Substitute service on the Texas Secretary of State occurred on August 16,

2021, and the case was removed to this Court on August 18, 2021. Thereafter, on August 30, 2021, Defendant received by certified mail copies of the Petition and the process received by the Secretary of State.

The returns of service are on file with this Court (Dkt Nos. 3 and 8), and the current deadline for Defendants to answer is **September 7, 2021**. *See* Fed. R. Civ. P. 81(c)(2)(A).

Due to the complexity of the matters at issue and the need for additional preparation time, Defendants respectfully request an extension of time—to **October 1, 2021**—to file an answer, move, or otherwise respond to the Petition.

Plaintiff does not oppose this extension.

WHEREFORE, premises considered, Defendants David Gryck and Theodor van Stephoudt respectfully request that the Court extend their deadline to answer, move, or otherwise respond to Plaintiff's lawsuit to October 1, 2021.

DATED: September 3, 2021

Respectfully Submitted,

**GIBBS & BRUNS LLP**

*/s/ Barrett H. Reasoner*

---

Barrett H. Reasoner  
State Bar No. 16641980  
Federal ID No. 14922  
[breasoner@gibbsbruns.com](mailto:breasoner@gibbsbruns.com)  
Ayesha Najam  
State Bar No. 24046507  
Federal ID No. 605948  
[anajam@gibbsbruns.com](mailto:anajam@gibbsbruns.com)  
1100 Louisiana, Suite 5300  
Houston, Texas 77002  
Telephone: (713) 650-8805

Facsimile: (713) 750-0903

*Counsel for Defendants  
David Gryck and  
Theodor van Stephoudt*

**CERTIFICATE OF CONFERENCE**

I hereby certify that prior to filing the above Unopposed Motion to Extend Time to Answer, the undersigned conferred with opposing counsel, Robert Corn, regarding the relief sought in this Motion. He is unopposed to the requested extension of time.

*/s/ Ayesha Najam*  
Ayesha Najam

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above David Gryck and Theodor Van Stephoudt's Unopposed Motion to Extend Time to Answer has been served on the following counsel/parties of record in accordance with Fed. R. Civ. P. 5 and local rules for electronic filing and service on this 3<sup>rd</sup> day of September 2021:

Robert M. Corn, Counsel for Plaintiff  
George M. Kryder, III, Counsel for Stone, Pigman, Walther, Wittman, LLC  
William P. Haddock, Counsel for Helena Energy, LLC

*/s/ Barrett H. Reasoner*  
Barrett H. Reasoner